

PLAINTIFFS' NOTICE OF FILING SECOND
ADDENDUM OF PROPOSED REVISED
CONSENT DECREE ON PLAINTIFFS'
FIFTH AND SIXTH CLAIMS FOR RELIEF

EXHIBIT 1

Sourovelis v. City of Philadelphia

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CHRISTOS SOUROVELIS, *et al.*,

Plaintiffs,

vs.

CITY OF PHILADELPHIA, *et al.*,

Defendants.

Civil Action No. 2:14-cv-04687

Assigned to the Honorable Judge Robreno

Special Management Track

**ADDENDUM TO PROPOSED REVISED CONSENT DECREE
ON PLAINTIFFS' FIFTH AND SIXTH CLAIMS FOR RELIEF**

1. This is a Second Addendum to the Proposed Revised Consent Decree (ECF 331-1) on Plaintiffs' Fifth and Sixth Claims for Relief ("Consent Decree") in *Sourovellis, et al. v. City of Philadelphia, et al.*, No. 2:14-cv-04687 (E.D. Pa.). The parties previously executed a First Addendum to the Consent Decree for the purpose of modifying the *cy pres* provisions set forth in Section X of the Consent Decree so as provide awards to individuals who filed claims but are outside of the Restitutionary Class because the properties which they held or hold legal title to, or otherwise had or have a legal interest in, were subject to a Statutory or Common Law civil-forfeiture petition that was no longer pending as of August 11, 2012. *See* ECF 331-2.

2. The purpose of this Second Addendum is to increase the flat award amounts from the Restitutionary Fund received by members of the Restitutionary Class and the individuals identified above consistent with the Court's Memorandum Opinion of January 27, 2021 (ECF 364). Thus, the provisions of this Second Addendum will govern in place of Paragraph 47(a).

3. Members of the Restitutionary Class who were neither convicted nor received a Diversionary Disposition in the criminal case associated with their forfeiture shall receive \$800.00. Members of the Restitutionary Class who received Diversionary Dispositions in the

criminal case associated with their forfeiture shall receive \$600.00. Members of the Restitutionary Class who were convicted in the criminal case associated with their forfeiture shall receive \$200.00.

Respectfully Submitted,

For Plaintiffs

Date: February 8, 2021

INSTITUTE FOR JUSTICE

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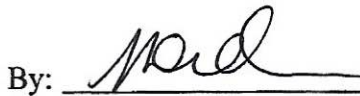
Local Counsel for Plaintiffs

Counsel for Plaintiffs

For the District Attorney Defendants

Date: 2/11/21

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